



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MAR 19 2007

**VIA FIRST CLASS MAIL**

Cleta Mitchell, Esq.  
Foley & Lardner, LLP  
3000 K Street NW, Suite 500  
Washington, DC 20007

RE: MUR 5780  
Rick Santorum

Dear Ms. Mitchell:

On August 8, 2006, the Federal Election Commission notified your client, Rick Santorum, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended.

On March 6, 2007, the Commission found, on the basis of the information in the complaint, and information provided by your client, that there is no reason to believe Rick Santorum violated the Act. Accordingly, the Commission closed its file in this matter, as it pertains to Rick Santorum. The Factual and Legal Analysis, which explains the Commission's finding, is enclosed.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Kate Belinski, the attorney assigned to this matter at (202) 694-1650.

Sincerely,

Thomasenia P. Duncan  
Acting General Counsel

BY: Rhonda J. Vosdigh  
Associate General Counsel  
for Enforcement

Enclosure  
Factual and Legal Analysis

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**FEDERAL ELECTION COMMISSION**  
**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: Rick Santorum

MUR: 5780

This matter was generated by a complaint filed with the Federal Election Commission by William R. Caroselli. *See* 2 U.S.C. § 437g(a)(1). Although the complaint named Senator Rick Santorum as a respondent, the complaint did not specifically allege, nor did any of the available information suggest, a basis for personal liability on the part of Senator Rick Santorum. Therefore, there is no reason to believe that Rick Santorum violated the Act.

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